

Message

From: Jasperse, Carie [Carie.Jasperse@fda.hhs.gov]
Sent: 10/18/2016 10:47:20 AM
To: Krasnic, Toni [krasnic.toni@epa.gov]
Subject: Re: Questions on PFOS _3M final rule

Thanks - could I call you at 8?

From: Krasnic, Toni
Sent: Tuesday, October 18, 2016 6:41 AM
To: Jasperse, Carie
Subject: RE: Questions on PFOS _3M final rule

Hi Carie,

I'm available today before 9am and 1-3.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Jasperse, Carie [mailto:Carie.Jasperse@fda.hhs.gov]
Sent: Friday, October 14, 2016 2:46 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>
Subject: RE: Questions on PFOS _3M final rule

Hi Toni - Is there a time I could call you to ask a few quick questions related to this? Thanks, Carie

Carie Jasperse
Associate Chief Counsel
FDA Office of Chief Counsel
HHS Office of General Counsel/Food and Drug Division
301-796-8567

From: Krasnic, Toni [mailto:krasnic.toni@epa.gov]
Sent: Wednesday, September 28, 2016 9:08 AM
To: Komolprasert, Vanee; Wolf, Joel
Subject: RE: Questions on PFOS _3M final rule

Hi Vanee,

Glad to hear that you didn't receive any comments on existing uses of these two chemicals.

There has not been any change in status of imports of the these two chemicals.

Thanks,

Toni Krasnic

Existing Chemicals Branch
EPA/OCSP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Komolprasert, Vanee [<mailto:Vanee.Komolprasert@fda.hhs.gov>]
Sent: Monday, September 26, 2016 9:43 PM
To: Wolf, Joel <Wolf.Joel@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>
Subject: RE: Questions on PFOS _3M final rule

Hi Joel/Toni,

The comment period of the 3M filing notice was closed, and we did not receive any comment that indicated the use of the two PFOS-related chemicals have not been completely abandoned.

Therefore, we are going to publish a final rule which revokes the approved food contact uses of these substances for specific paper coatings.

Before we publish the final rule, we would like to check if there has been any change in status of imports of these chemicals after your last email update on April 8, 2016.

Thank you very much.

Sincerely,

Vanee Komolprasert

Vanee Komolprasert, Ph.D., P.E.
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From: Wolf, Joel [<mailto:Wolf.Joel@epa.gov>]
Sent: Friday, April 08, 2016 10:55 AM
To: Komolprasert, Vanee
Cc: Krasnic, Toni
Subject: RE: Questions on PFOS

Dear Vanee,

Thanks for the update on 3M and their petition seeking to remove use of two PFOS-related chemicals.

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At the time of EPA's rulemaking on PFOS and PFOS-related chemicals under Toxic Substances Control Act (see [40 CFR §721.9582](#); also see <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/long-chain-perfluorinated-chemicals-pfcs> for links to final rules), 3M was the sole manufacturer of PFOS and PFOS-related chemicals that were regulated by EPA's significant new use rules (SNURs). After 3M's phaseout of those chemicals, some companies in China begun production of PFOS and PFOS-related chemicals, however, those chemicals cannot be imported into U.S. without first notifying EPA of intent to import by submitting a significant new use notice (SNUN) at least 90 days before doing so. The notification allows EPA to evaluate the intended use and to take appropriate action. To date, we have not received a SNUN on PFOS or any PFOS-related chemicals.

Hope this is helpful. If you have additional questions, please contact Toni Krasnic on my staff at 202-564-0984 or krasnic.toni@epa.gov.

Best, Joel

Joel Wolf
Chief, Existing Chemicals Branch
WJC East, Room 4121A
202.564.0432, wolf.joel@epa.gov

From: Komolprasert, Vanee [<mailto:Vanee.Komolprasert@fda.hhs.gov>]
Sent: Wednesday, April 06, 2016 12:21 PM
To: Wolf, Joel <Wolf.Joel@epa.gov>
Subject: FW: Questions on PFOS
Importance: High

Hi Joel,

Here is emails in communication with Jay Bassett (EPA in Atlanta, GA) whom I met at a meeting in Feb.
Hope you can help answer our questions sent to Jay on 4/1/16, see below.

Thanks so much.

Sincerely,

Vanee Komolprasert, Ph.D., P.E.
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From: Komolprasert, Vanee
Sent: Wednesday, April 06, 2016 11:38 AM
To: 'Bassett, Jay'
Subject: RE: Questions on PFOS
Importance: High

Good morning Jay,

Any process on this? Is there a phone number that I can find out who involved in this matter?
We have deadline to meet, so it is considered urgent.

Thanks again for your help.

Vanee

From: Bassett, Jay [mailto:Bassett.Jay@epa.gov]
Sent: Friday, April 01, 2016 10:17 AM
To: Komolprasert, Vanee
Subject: RE: Questions on PFOS

Vanee

This goes beyond my lane to address – I'll make a few calls and find the right person to answer your questions

Jay

Jay Bassett | Chief RCRA Programs and Materials Management
404.562.8559 (w)

From: Komolprasert, Vanee [mailto:Vanee.Komolprasert@fda.hhs.gov]
Sent: Friday, April 01, 2016 9:42 AM
To: Bassett, Jay <Bassett.Jay@epa.gov>
Subject: Questions on PFOS
Importance: High

Good morning Jay,

How are you? Hope you do well. I have a few questions on PFOS and hope you are able to provide guidance and help.

We received a petition from the 3M company, seeking to remove use of two regulated chemicals derived from PFOS, and they claimed that they are the sole manufacturer of the PFOS in the US and overseas. If they stop making PFOS, then the two petitioned chemicals will not be available on the market for use. i.e., these two petitioned chemicals are no longer manufactured and its uses are considered to be abandoned. The 3M referenced the EPA Fact sheet on PFOS (March 2014) to support their claim.

In EPA Fact sheet (March 2014): https://www.epa.gov/sites/production/files/2014-04/documents/factsheet_contaminant_pfos_pfoa_march2014.pdf, there is the following bullet on the second page, as follows.

"The 3M Company, the primary manufacturer of PFOS, completed a voluntary phase-out of PFOS production in 2002 (ATSDR 2009; 3M 2008)."

My questions are:

1. Does the statement suggest that the 3M be the sole manufacturer of PFOS in the US and overseas?
2. Does EPA know or have information that support the 3M is the sole manufacturer of PFOS in the US and overseas?

3. Does EPA have information of other (small, medium or large) manufacturers that may still produce PFOS (in the US and other countries)?

Any advice on this matter is appreciated.
Hope to hear from you soon.
Thanks.

Have a great weekend.

Best regards,

Vanee